

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
(ST. LOUIS)**

In Re:)	
)	
Kevin Anthony Taylor)	
)	
Debtor,)	Case No. 21-40405
_____)	
)	Chapter 13
)	
U.S. Bank Trust, National Association)	Re: Doc 28
)	
)	
Movant/Creditor.)	

SECURED CREDITOR'S RESPONSE TO DEBTOR'S OBJECTION TO CLAIM 2

COMES NOW U.S. Bank Trust National Association as Trustee of Bungalow Series IV Trust (hereinafter "Creditor"), by and through counsel, and hereby responds as follows to Debtor's Objection to Claim 2:

1. Debtor filed an Objection to Creditor's Claim on July 6, 2021 (Doc 28).
2. While the Creditor agrees that the Trustee pre-petition arrears payments to Creditor may be suspended during the duration of the trial loan modification payment plan, the Creditor's Claim 2 should remain a valid claim in the bankruptcy case until the Debtor successfully completes the trial loan modification payment plan.

WHEREFORE, Creditor respectfully requests that Debtor's Objection to Claim 2 be denied and that the Secured Creditor's secured debt under Claim 2 be maintained until a determination is made between the parties regarding a permanent loan modification.

Respectfully submitted,

MARINOSCI LAW GROUP, P.C.

/s/ David V. Noyce

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Secured Creditor's response to the Debtor's Objection to Claim 2 was electronically filed on July 12, 2021, with electronic notices being sent to all CM/ECF parties and mailed by US Mail postage prepaid to all non-CM/ECF parties:

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/s/ David V. Noyce

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